

SHER TREMONTE LLP

November 17, 2023

BY ECF

The Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: *United States v. Jona Rechnitz*
Case No. 16 Crim. 389 (KPF)

Dear Judge Failla:

I represent Jona Rechnitz. I write with the consent of the government and counsel for the New York City Correctional Officers' Benevolent Association ("COBA") to respectfully request an approximately one-month adjournment of Mr. Rechnitz's re-sentencing, currently scheduled for January 5, 2024. Sentencing submissions and responses are due in this matter on December 15 and December 22, 2023, respectively. I am requesting an adjournment because in the last two weeks, I have had two hearings scheduled that coincide with these deadlines. Specifically, I have a *Franks* hearing scheduled before the Honorable LaShann DeArcy Hall in the Eastern District of New York on December 18 and 19; and I have a *Fatico* hearing scheduled before the Honorable Eric Komitee in the Eastern District on December 21. Given the amount of preparation these hearings will require, I will need additional time to complete Mr. Rechnitz's sentencing submission and response to any submission from the government and COBA. Accordingly, I respectfully request that the Court adjourn the deadline for sentencing submissions to January 16, 2024, with responses due January 23, 2024, and sentencing to follow any time convenient for the Court the week of February 5, 2024. I have conferred with counsel for the government and COBA and both consent to the proposed adjournment.

I appreciate the Court's consideration.

Respectfully submitted,

/s/ Noam Biale
Noam Biale

Attorneys for Jona Rechnitz

cc: All counsel of record (via ECF)

Application GRANTED. Defendant's resentencing is hereby ADJOURNED to **February 6, 2024** at **3:00 p.m.** The deadline for the parties to submit supplemental sentencing submissions is hereby ADJOURNED to **January 16, 2024**; any responsive submissions are due on or before **January 23, 2024**.

The Clerk of Court is directed to terminate the motion at docket entry 210.

SO ORDERED.

Dated: November 17, 2023
New York, New York

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE